

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: SCOTT JEFFREY ALWINE, II : CHAPTER 13  
Debtor :  
 :  
 :  
 JACK N. ZAHAROPOULOS :  
 STANDING CHAPTER 13 TRUSTEE :  
 Movant :  
 :  
 :  
 vs. :  
 :  
 :  
 SCOTT JEFFREY ALWINE, II :  
 Respondent : CASE NO. 1-23-bk-02088

TRUSTEE'S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 30<sup>th</sup> day of November, 2023, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)' plan for the following reason(s):

1. Debtor(s)' plan violates 11 U.S.C. § 1322(a)(2) in that the debtor(s) has not provided for full payment, in deferred cash payments, of all claims entitled to priority under 11 U.S.C. § 507 – Claim #1-1 not provided for in the plan.

2. The debtor has not demonstrated that all tax returns have been filed as required by § 1325(a)(9) – 2019 Federal.

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

BY: /s/Douglas R. Roeder  
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 1st day of December, 2023, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

E. Haley Rohrbaugh, Esquire  
135 North George Street  
York, PA 17401

/s/Deborah A. DePalma  
Office of Jack N. Zaharopoulos  
Standing Chapter 13 Trustee